

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SAFETY-KLEEN SYSTEMS, INC.,	:	CIVIL ACTION NO. CV-02-3565
	:	
Plaintiff,	:	
	:	
v.	:	
DON PENNELL,	:	
Defendant.	:	

**UNCONTESTED MOTION OF PLAINTIFF, SAFETY-KLEEN
SYSTEMS, INC. FOR SPECIAL ADMISSION OF OUT-OF-STATE COUNSEL**

Plaintiff, Safety-Kleen Systems, Inc. ("Plaintiff"), by and through its associate counsel, Stradley, Ronon, Stevens & Young, LLP, hereby submits this uncontested motion Court to allow the special admission of Cherie W. Blackburn, Amy Yager Jenkins, William H. Foster, III and Steven M. Wynkoop, Esquires, of the law firm Nelson, Mullins Riley & Scarborough, L.L.P. to participate actively in the pre-trial, trial and any post-trial proceedings in this case. In support of this motion, Plaintiff relies upon and incorporates the attached memorandum of law and the arguments set forth therein.

WHEREFORE, Plaintiff, Safety-Kleen Systems, Inc. respectfully requests that this Court specially admit Ms. Blackburn, Ms. Jenkins, Mr. Foster and Mr. Wynkoop to this

Court and that they be permitted to participate actively in all phases in this action, including all pre-trial, trial, and post-trial proceedings before this Court.

Jason K. Cohen
Identification No. 82444
STRADLEY, RONON, STEVENS & YOUNG, LLP
2600 One Commerce Square
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(215) 564-8000

Attorneys for Plaintiff,
Safety-Kleen Systems, Inc.

Of Counsel:

**NELSON MULLINS RILEY &
SCARBOROUGH, L.L.P.**
151 Meeting Street
Suite 600
P.O. Box 1806
Charleston, SC 29401

DATED: June 14, 2002

IN THE UNITED STATES DISTRICT COURT
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SAFETY-KLEEN SYSTEMS, INC.,	:	CIVIL ACTION NO. CV-02-3565
	:	
Plaintiff,	:	
	:	
v.	:	
DON PENNELL,	:	
Defendant.	:	

ORDER

AND NOW, this day of , 2002, upon consideration of the uncontested motion of Plaintiff, Safety-Kleen Systems, Inc. for special admission of out-of-state counsel, Cherie W. Blackburn, Amy Yager Jenkins, William H. Foster, III and Steven M. Wynkoop, Esquires, of the law firm of Nelson Mullins Riley & Scarborough, L.L.P.

For good cause shown;

It is hereby **ORDERED** that Plaintiff's motion for special admission is **GRANTED**; and

It is **FURTHER ORDERED** that Cherie W. Blackburn, Amy Yager Jenkins, William H. Foster, III and Steven M. Wynkoop, Esquires of the law firm of Nelson Mullins Riley & Scarborough, L.L.P. are permitted to participate actively in all phases of this litigation, including all pre-trial, trial and post-trial proceedings before this Court.

J.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SAFETY-KLEEN SYSTEMS, INC.,	:	CIVIL ACTION NO. CV-02-3565
	:	
Plaintiff,	:	
	:	
v.	:	
DON PENNELL,	:	
Defendant.	:	

**MEMORANDUM OF LAW OF PLAINTIFF SAFETY-KLEEN
SYSTEMS, INC. IN SUPPORT OF ITS UNCONTESTED MOTION
FOR SPECIAL ADMISSION OF OUT-OF-STATE COUNSEL**

Plaintiff, Safety-Kleen Systems, Inc. ("Plaintiff"), by and through its associate counsel, Stradley, Ronon, Stevens & Young, LLP, submits this memorandum of law in support of its uncontested motion to allow the special admission of Cherie W. Blackburn, Amy Yager Jenkins, William H. Foster, III and Steven M. Wynkoop, Esquires, of the law firm of Nelson Mullins Riley & Scarborough, L.L.P.

Plaintiff has retained Stradley, Ronon, Stevens & Young, LLP, 2600 One Commerce Square, Philadelphia, PA, 19103 to serve as associate counsel of record in this case. The law firm of Nelson Mullins Riley & Scarborough, L.L.P. has been retained as primary counsel. In view of the nature of this action, Plaintiff seeks to have its primary counsel and Cherie W. Blackburn, Amy Yager Jenkins, William H. Foster, III and Steven M. Wynkoop, participate fully in all phases of this action, including pre-trial, trial and post-trial proceedings. Counsel for defendant, Timothy Duffy, has consented to this motion.

Cherie W. Blackburn is a principal at Nelson Mullins Riley & Scarborough, L.L.P. She is an active member of the South Carolina bar. Ms. Blackburn is admitted to practice

before the Supreme Court of the United States, the United States District Court for the District of South Carolina and the United States Court of Appeals for the Fourth Circuit. She is a member in good standing and is eligible to practice in all of the courts listed above.

Amy Yager Jenkins is also a principal of Nelson Mullins Riley & Scarborough, L.L.P. and is an active member of the South Carolina and North Carolina bars. She is admitted to practice before the United States District Court for the District of South Carolina, the United States District Courts for the Eastern and Western Districts of North Carolina and the United States Court of Appeals for the Fourth Circuit. Ms. Jenkins is a member in good standing and is eligible to practice in all of the courts listed above.

William H. Foster, III is a principal at Nelson Mullins Riley & Scarborough, L.L.P. He is an active member of the South Carolina bar. Mr. Foster is admitted to practice before the 4th United States Circuit Court of Appeals and the United States District Court for the District of South Carolina. He is a member in good standing and is eligible to practice in all of the courts listed above.

Steven M. Wynkoop is a principal at Nelson Mullins Riley & Scarborough, L.L.P. He is an active member of the South Carolina bar. Mr. Wynkoop is admitted to practice before the 4th United States Circuit Court of Appeals and the United States District Court for the District of South Carolina. He is a member in good standing and is eligible to practice in all of the courts listed above.

In view of Plaintiff's relationship with the law firm of Nelson Mullins Riley & Scarborough, L.L.P. and the nature of this action, it is in Plaintiff's best interests for these attorneys to participate actively in the preparation and trial of this action.

CONCLUSION

For all the foregoing reasons, Plaintiff, Safety-Kleen Systems, Inc. respectfully requests that this Court specially admit Ms. Blackburn, Ms. Jenkins, Mr. Foster and Mr. Wynkoop to this Court, and that they be permitted to participate in all phases of this action, including all pre-trial, trial and post-trial proceedings.

Jason K. Cohen
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Attorneys for Plaintiff,
Safety-Kleen Systems, Inc.

Of Counsel:

**NELSON MULLINS RILEY &
SCARBOROUGH, L.L.P.**

151 Meeting Street
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P.O. Box 1806
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CERTIFICATE OF SERVICE

I, Jason K. Cohen, Esquire hereby certify that on June 14, 2002, I caused a copy of the foregoing to be served by United States mail, first class postage prepaid upon the following:

Timothy A. Duffy, Esquire
Kirkland & Ellis
Aon Center
200 East Randolph Drive
Chicago, Illinois 60601

Attorney for Defendant
Don R. Pennell

Jason K. Cohen